

REMARKS

This Amendment is filed in response to the Office Action mailed on 3 October 2006. All objections and rejections are respectfully traversed.

Claims 1-18, and 29-30 are in the case.

Claims 19-28 were cancelled without prejudice.

No new claims were added.

At Paragraph 2-3 of the Office Action a restriction requirement was entered stating two groups:

Group I, claims 1-18.

Group II, claims 19-28.

Claims 19-28 were withdrawn from consideration in response to a telephone conversation between the Examiner and Attorney Duane Dreger.

Accordingly, Applicant elects Group I claims, including Claims 1-18, and 29-30.

At Paragraph 5-6 of the Office Action, claims 1-18, and 29-30 were rejected under 35 U.S.C. 102(e) as being anticipated by Lev Ran, et al. U. S. Patent Application No. 2004/0255048 A1 published December 16, 2004 (hereinafter Lev Ran).

Applicant's claimed invention, as set forth in representative claim 1, comprises in part:

1. A method for a storage operating system implemented in a storage system to concurrently perform readahead operations for a plurality of different read streams established in one or more files, directories, vdisks or luns stored in the storage system, the method comprising:

receiving a client read request at the storage system, the client read request indicating client-requested data for the storage operating system to retrieve from a file, directory, vdisk or lun stored in the storage system;

determining whether the received client read request matches any of a plurality of readset data structures ("readsets") allocated for the file, directory, vdisk or lun containing the client-requested data; and

performing readahead operations in accordance with a set of readahead metadata stored in a readset that is determined to match the received client read request.

Lev Ran discloses a method for a proxy server to intercept a request for data submitted by a client, and to forward the data to the client, where the client and a server holding the data are on different local area networks. As Lev Ran states in his Paragraph 296,

"Each VFN receiver 48 maintains a virtual directory of files held by remote file servers on other LANs. All registered directory trees from the remote users are pre-positioned in the virtual directory. The directory information is preferably kept up-to-date, irrespective of file requests by its local clients, by tracking and notification of changes by the VFN transmitter or by active scanning and updating of changes by the VFN receiver. When the VFN receiver intercepts a request for file directory information or file metadata from one of local clients 28, the VFN receiver looks up the information on its local virtual directory. The VFN receiver then receiver then returns the requested information directly to the client."

Applicant respectfully urges that Lev Ran has no disclosure of Applicant's claimed novel *receiving a client read request at the storage system . . . determining whether the received client read request matches any of a plurality of readset data structures . . . performing readahead operations in accordance with a set of readahead metadata stored in a readset that is determined to match the received client read request.*

That is, Lev Ran has a proxy server which intercepts requests for data stored in a server, and then Lev Ran discloses the proxy server using its cache to respond to the intercepted request.

In sharp contrast, Applicant has *a set of readahead metadata stored in a readset that is determined to match the received client read request*, and then uses the *readahead metadata* in *performing readahead operations*.

Stated differently, Applicant has a novel method of *performing readahead operations in accordance with a set of readahead metadata stored in a readset that is determined to match the received client read request*, while Lev Ran simply uses a cache to speed up a response to a request for data.

Accordingly, Applicant respectfully urges that Lev Ran is legally precluded from anticipating Applicant's claimed novel invention under 35 U.S.C. 102 because of the ab-

sence in Lev Ran of Applicant's claimed novel *receiving a client read request at the storage system . . . determining whether the received client read request matches any of a plurality of readset data structures . . . performing readahead operations in accordance with a set of readahead metadata stored in a readset that is determined to match the received client read request.*

All independent claims are believed to be in condition for allowance.

All dependent claims are dependent from independent claims which are believed to be in condition for allowance. Accordingly, all dependent claims are believed to be in condition for allowance.

Favorable action is respectfully solicited.



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Respectfully submitted,

A handwritten signature in cursive script that reads "A. Sidney Johnston". The signature is written over a horizontal line.

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